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February 24, 2016

Andrew Bejiman Stannard  
Agent for Service of Process  
Andy's Auto Wrecking, Incorporated  
4019 S. Mission Road  
Fallbrook California 92028

VIA CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Andrew B. Stannard  
Owner and Legally Responsible Person  
A & B Truck Recycling  
2863 Commercial Street  
San Diego California 92113

Re: Clean Water Act Notice of Intent to Sue/60-Day Notice Letter  
A & B Truck Recycling Violations of General Industrial Permit

Dear Mr. Stannard:

Please accept this letter on behalf of the Coastal Environmental Rights Foundation (CERF) regarding Andy's Auto Wrecking Incorporated, Inc (doing business as A & B Truck Recycling) violations of the State Water Resources Control Board Water Quality Order No. 97-03-DWQ, Natural Pollutant Discharge Elimination System (NPDES), General Permit No. CAS000001, and Waste Discharge Requirements for Discharges of Storm Water Associated With Industrial Activities Excluding Construction Activities (General Industrial Permit).<sup>1</sup> This letter constitutes CERF's notice of intent to sue for violations of the Clean Water Act and General Industrial Permit for the A & B Truck Recycling facility located at 2863 Commercial Street, San Diego CA, 92113 ("Facility" or "A & B Truck"), as set forth in more detail below.

Section 505(b) of the Clean Water Act requires that sixty (60) days prior to the initiation of a citizen's civil lawsuit in Federal District Court under Section 505(a) of the Act, a citizen must give notice of the violations and the intent to sue to the violator, the Administrator of the U.S. Environmental Protection Agency, the Regional Administrator of the U.S. Environmental Protection Agency for the region in which the violations have occurred, the U.S. Attorney General, and the Chief Administrative Officer for the State in which the violations have occurred (33 U.S.C. § 1365(b)(1)(A)). This letter provides notice of A & B Truck's Clean Water Act violations and CERF's intent to sue.

**I. Coastal Environmental Rights Foundation (CERF)**

CERF is a non-profit public benefit corporation organized under the laws of the State of California with its main office in Encinitas, CA. CERF is dedicated to the preservation,

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<sup>1</sup> On April 1, 2014, the State Water Resources Control Board adopted Order No. 2014-0057-DWQ, which amends the Industrial General Permit ("New Industrial Permit"). These amendments became effective on July 1, 2015. All references to the General Industrial Permit are to the Permit as it existed at the time of the violations noted herein.

protection, and defense of the environment, the wildlife, and the natural resources of the California Coast. Members of CERF use and enjoy the waters into which pollutants from A & B Truck's ongoing illegal activities are discharged, namely Chollas Creek, San Diego Bay, and eventually the Pacific Ocean. The public and members of CERF use Chollas Creek and San Diego Bay to fish, boat, kayak, surf, swim, scuba dive, birdwatch, view wildlife, and to engage in scientific studies. The discharge of pollutants by the A&B Truck Facility affects and impairs each of these uses. Thus, the interests of CERF's members have been, are being, and will continue to be adversely affected by the A & B Truck Facility Owners and/or Operators' (collectively referred to as "A & B Truck Owners") failure to comply with the Clean Water Act and the General Industrial Permit.

## **II. Storm Water Pollution and the General Industrial Permit**

### **A. Duty to Comply**

Under the Clean Water Act, the discharge of any pollutant to a water of the United States is unlawful except in compliance with certain provisions of the Clean Water Act. (See 33 U.S.C. § 1311 (a)). In California, any person who discharges storm water associated with industrial activity must comply with the terms of the General Industrial Permit in order to lawfully discharge. A & B Truck enrolled as a discharger subject to the General Industrial Permit on July 19, 1993. A & B enrolled under the New Industrial Permit on May 8, 2015, WDID Number 9 371010097.

The A & B Truck Facility is a 1.5-acre site with three buildings and numerous pathways for pollutant exposure to storm water. (SWPPP, p. 4). Significant materials onsite include salvaged vehicles, engines, transmissions, rear ends, radiators, oil filters, batteries, waste oils, antifreeze, drained and new fuels, freon, tires, lead weights, mercury switches, wheels and rims, wash water, crushed vehicles, delivery trucks and forklifts. (SWPPP, p. 5). The A & B Truck Facility handles, collects, drains, and sorts various materials. (SWPPP, p. 6). "Recyclable material activities include: draining waste automotive fluids, dismantling engines, transmissions, rear ends, radiators, batteries and other parts such as torque converters, tires and wheels, fenders hoods, trunk lids, mercury switches, air bags and high value metal parts such as aluminum parts or copper wires." (*Id.*).

Pursuant to Section C(1) of the General Industrial Permit, a facility operator must comply with all conditions of the General Industrial Permit. (See New Industrial Permit, §I.A.8. [dischargers must "comply with all requirements, provisions, limitations, and prohibitions in this General Permit."]). Failure to comply with the General Industrial Permit is a Clean Water Act violation. (General Industrial Permit, § C.1; New Industrial Permit §XXI.A.). Any non-compliance further exposes an owner or operator to enforcement action and/or removal from General Permit coverage. (*Id.*). As an enrollee, A & B Truck has a duty to comply with the General Industrial Permit and New Industrial Permit and is subject to all of the provisions therein.

### **B. Failure to Monitor**

The A & B Truck Owners have failed to sample as required under the New Industrial Permit, which became effective July 1, 2015. The A & B Truck Owners have failed to meet monitoring requirements for the first half of the 2015-2016 wet season, though there have been numerous qualifying storm events since July 1<sup>st</sup>. The New Industrial Permit requires dischargers

to take two samples between July 1 and December 31 and two samples between January 1 and June 30. (New Industrial Permit, §XI.B.2). Likewise, the Facility SWPPP requires A & B Truck to sample a minimum of four samples per year. (SWPPP, p. 36). A & B Truck has failed to comply with these requirements.

Further, under the General Industrial Permit, A & B Truck was enrolled as part of the Nest Group Monitoring Plan (GMP). While enrolled in this GMP, A & B failed to monitor from at least two storm events over a five-year period as required by General Industrial Permit Section B.15.b. Pursuant to records available to CERF, A & B Truck monitored only in 1999, 2001, 2005, 2008, and 2011. Thus, during the five-year period between 2009 and 2014, A & B Truck monitored only one time.

Moreover, the A & B SWPPP, the Nest GMP Facility site maps, and A & B's own site maps all reflect the A & B Truck Facility has (and has always had) two discharge locations. (See SWPPP, pp. 4 and 34; 2011-2012 Annual Report; Site Maps dated 12.10.03, 2.08.2016). However, all monitoring at the Facility sampled only one discharge point – not both. The Facility has not provided justification for either a representative sampling reduction or qualified combined sample. (New Industrial Permit, § XI.C.4. and 5). Indeed, the A & B Truck Facility SWPPP expressly states the “facility has not identified an opportunity for sampling reduction” and the “Discharger has not at the present time identified discharge sampling locations to be combined at the lab.” (SWPPP, p. 39). Therefore, both discharge point should have been monitored.

Lastly, the latest and only A & B Truck monitoring data since the New Industrial Permit went into effect failed to include analysis for copper or zinc despite the fact that A & B routinely exceeded benchmarks (and other applicable standards) for these constituents and that Nest previously noted the industrial sector associated with SIC Code 5015 had the potential to discharge zinc and copper in its storm water. (See Nest GMP Rev 7/30/13, p. 8). Moreover, because the Facility is “primarily engaged in dismantling motor vehicles for scrap” it should be classified in Industry 5093 and should also be monitoring zinc and copper on this basis as well.<sup>2</sup>

The A & B Owners had numerous opportunities to sample both discharge locations but failed to do so. (See Exhibit A). They are thus subject to penalties in accordance with the New Industrial Permit and General Industrial Permit – punishable by a minimum of \$37,500 per day of violation. (33 U.S.C. §1319(d); 40 CFR 19.4).

### **C. The A & B Truck Facility Discharges Contaminated Storm Water in Violation of the General Industrial Permit**

Though few and far between, the A & B Truck monitoring reports indicate consistent exceedances and violations of the General Industrial Permit and New Industrial Permit. Discharge Prohibition A(2) of the General Industrial Permit and New Industrial Permit Sections III.C-D prohibit storm water discharges and authorized non-storm water discharges which cause or threaten to cause pollution, contamination, or nuisance.

Receiving Water Limitation C(1) of the Storm Water Permit prohibits storm water discharges to surface or groundwater that adversely impact human health or the environment.

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<sup>2</sup> [https://www.osha.gov/pls/imis/sic\\_manual.display?id=962&tab=description](https://www.osha.gov/pls/imis/sic_manual.display?id=962&tab=description)



In addition, receiving Water Limitation C(2) prohibits storm water discharges and authorized non-storm water discharges, which cause or contribute to an exceedance of any water quality standards or applicable Basin Plan water quality standards. (See New Industrial Permit Receiving Water Limitations VI.A-C).

The California Toxics Rule ("CTR"), 40 C.F.R. 131.38, is an applicable water quality standard. (*Baykeeper v. Kramer Metals, Inc.* (C.D.Cal. 2009) 619 F.Supp.2d 914, 926). "In sum, the CTR is a water quality standard in the General Permit, Receiving Water Limitation C(2). A permittee violates Receiving Water Limitation C(2) when it 'causes or contributes to an exceedance of' such a standard, including the CTR." (*Id.* at 927).

If a discharger violates Water Quality Standards, the General Industrial Permit and the Clean Water Act require that the discharger implement more stringent controls necessary to meet such Water Quality Standards. (General Industrial Permit, Fact Sheet p. viii; 33 U.S.C. § 1311(b)(1)(C)). The A & B Truck Owners have failed to comply with this requirement, routinely violating Water Quality Standards without implementing BMPs to achieve BAT/BCT or revising the Facility's SWPPP pursuant to General Industrial Permit section (C)(3) and New Industrial Permit Section X.B.1.

As demonstrated by sample data submitted by A & B Truck, from 1999 through the present (likely from enrollment), the A & B Truck owners have discharged and continue to discharge storm water containing pollutants at levels in violation of water quality prohibitions and limitations during every significant rain event. The A & B Truck Facility's sampling data reflects numerous discharge violations (see below). A & B Truck's own sampling data is not subject to impeachment. (*Baykeeper, supra*, 619 F.Supp. 2d at 927, citing *Sierra Club v. Union Oil Co. of Cal.*, (9th Cir. 1987) 813 F.2d 1480, 1492 ["when a permittee's reports indicate that the permittee has exceeded permit limitations, the permittee may not impeach its own reports by showing sampling error"]).

This data further demonstrates the A & B Truck Facility continuously discharges contaminated storm water during rain events which have not been sampled.

No.	Date	Parameter	Units	Result	Benchmark/WQO
1	1/5/2016	Lead	mg/L	.68	.065
2	1/5/2016	Iron	mg/L	15	1.0
3	1/5/2016	Aluminum	mg/L	12	.75
4	1/5/2016	TSS	mg/L	520	100
5	11/4/2011	Zinc	mg/L	1.9	.12
6	11/4/2011	Copper	mg/L	.08	.013
7	11/4/2011	Conductance	umhos/cm	310	200
8	12/15/08	Copper	mg/L	.0889	.013
9	12/15/08	Zinc	mg/L	.866	.12
10	10/17/2005	Copper	mg/L	.22	.013
11	10/17/2005	Zinc	mg/L	2.1	.12
12	10/17/2005	Lead	mg/L	.19	.065

13	10/17/2005	Conductance	umhos/cm	760	200
14	1/12/2001	Conductance	umhos/cm	216	200
15	1/12/2001	Zinc	mg/L	.507	.12
16	1/12/2001	Copper	mg/L	.0666	.013
17	1/25/1999	Conductance	umhos/cm	270	200
18	1/25/1999	Zinc	mg/L	.86	.12
19	1/25/1999	Copper	mg/L	.11	.013

Every day the A & B Truck Owners discharged or continue to discharge polluted storm water in violation of the Discharge Prohibitions and Receiving Water Limitations of the General Industrial Permit is a separate and distinct violation of the Permit and Section 301(a) of the Clean Water Act, 33 U.S.C. §1311(a). The A & B Truck Owners are subject to civil penalties for all violations of the Clean Water Act occurring since February 24, 2011. These violations are ongoing and will continue each day contaminated storm water is discharged in violation of the requirements of the General Industrial Permit and New Industrial Permit. CERF will include additional violations when information becomes available.

**D. Failure to Develop and/or Implement BMPs that Achieve Compliance with Best Available Technology Economically Achievable and Best Conventional Pollutant Control Technology**

Effluent Limitation (B)(3) of the General Industrial Permit requires dischargers to reduce or prevent pollutants associated with industrial activity in storm water discharges and authorized non-storm water discharges through implementation of the Best Available Technology Economically Achievable (BAT) for toxic pollutants<sup>3</sup> and Best Conventional Pollutant Control Technology (BCT) for conventional pollutants.<sup>4</sup> Likewise, the New Industrial Permit "requires control of pollutant discharges using BAT and BCT to reduce and prevent discharges of pollutants, and any more stringent effluent limitations necessary for receiving waters to meet applicable water quality standards." (New Industrial Permit, §I.D.32; see also, §V.A.).

EPA Benchmarks and New Industrial Permit Numeric Action Levels (NALs) are the pollutant concentrations which generally indicate whether a facility has successfully developed or implemented BMPs that meet the BAT/BCT.

Discharges with pollutant concentration levels above EPA Benchmarks, NALs and/or the CTR demonstrate that a facility has failed to develop and/or implement BMPs that achieve compliance with BAT for toxic pollutants and BCT for conventional pollutants. The A & B Truck Facility annual reports and monitoring data demonstrate consistent exceedances of not only the CTR, but also EPA benchmarks and NALs. (See monitoring data above).

Thus, A & B Truck's storm water discharge sampling data demonstrates the Facility has not developed and/or implemented BMPs that meet the standards of BAT/BCT. (See

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<sup>3</sup> Toxic pollutants are found at 40 CFR § 401.15 and include, but are not limited to: lead, nickel, zinc, silver, selenium, copper, and chromium.

<sup>4</sup> Conventional pollutants are listed at 40 CFR § 401.16 and include biological oxygen demand, total suspended solids, pH, fecal coliform, and oil and grease.

*Baykeeper, supra*, 619 F.Supp. 2d at 925 ["Repeated and/or significant exceedances of the Benchmark limitations should be relevant" to the determination of meeting BAT/BCT]).

Observations by City of San Diego stormwater consultants confirm these violations. Semi-annual inspections by City consultants since early 2010 reveal consistent failure to implement BMPs. The consultants noted used absorbent was not appropriately disposed; "debris in front of the trench drain"; "significant amount of oil in last chamber of west end interceptor;" "oil and rusty water in last clarifier chamber;" oil leaks, auto fluid leaks, "large leak by car crusher;" uncovered materials such as "used car parts, tires, and auto fluid buckets;" oily areas near the compactor; improper outdoor storage of uncontained 5-gallon oil buckets; and "evidence of oily water sumped to street." CERF investigators also noted oily water discharging from the site onto Commercial Street on January 7, 2016. (See Exhibit B).

Thus, the A & B Truck Owners are seriously in violation of Effluent Limitation (B)(3) of the Storm Water Permit and Section V.A. of the New Industrial Permit. Every day the A & B Truck Owners operate with inadequately developed and/or implemented BMPs in violation of the BAT/BCT requirements is a separate and distinct violation of the Permits and Section 301(a) of the Clean Water Act. (33 U.S.C. § 1311 (a)). Therefore, the A & B Truck Owners have been in daily and continuous violation of the BAT/BCT requirements of the General Industrial Permit every day since at least February 24, 2009, and are subject to penalties for all such violations. Thus, the A & B Truck Owners are liable for civil penalties for 1,825 violations of the General Industrial Permit and the Clean Water Act.

These violations are ongoing and the A & B Truck Owners will continue to be in violation every day they fail to develop and/or implement BMPs that achieve BAT/BCT to prevent or reduce pollutants associated with industrial activity in storm water discharges at the A & B Truck Facility.

#### **E. Inadequate Storm Water Pollution Prevention Plan**

One of the main requirements for the General Industrial Permit is the Storm Water Pollution Prevention Plan (SWPPP). (General Industrial Permit §A; New Industrial Permit §X.). A & B Truck has not developed an adequate SWPPP as required by the General Permit or New Industrial Permit. (New Industrial Permit, §X.A.1-10).

The latest A & B Truck SWPPP, uploaded to SMARTS on February 19, 2016, also fails to identify the receiving waters (Chollas Creek and San Diego Bay) and fails to identify the impaired status of both water bodies. Thus, the SWPPP fails to evaluate the Facility's potential contribution of pollutants for which these receiving waters are listed. According to the 2010 303(d) List of Impaired Water Bodies, Chollas Creek is impaired for copper, diazinon, bacteria, lead, phosphorous, nitrogen, trash, and zinc. San Diego Bay, near Chollas Creek, is listed as impaired for benthic community effects, PCBs, and sediment toxicity.

The latest SWPPP also fails to account for the numerous and repeated violations identified by A & B Truck's monitoring data – ensuring these violations continue. The SWPPP is therefore inadequate. (See New Industrial Permit §I.E.37. ["Compliance with water quality standards may, in some cases, require Dischargers to implement controls that are more protective than controls implemented solely to comply with the technology-based requirements in this General Permit."]). If a discharger determines industrial discharges contain pollutants in



violation of Receiving Water Limitations (Section VI), the discharger is required to assess the BMPs in the SWPPP and determine whether additional measures and a revised SWPPP are necessary. (New Industrial Permit, §XX.B.1). A & B Truck has clearly failed to comply with these requirements.

Every day the A & B Truck Owners operate the Facility without an adequate SWPPP, is a separate and distinct violation of the General Industrial Permit, New Industrial Permit, and Section 301(a) of the Clean Water Act, 33 U.S.C. § 1311(a). The A & B Truck Owners have been in daily and continuous violation of the General Industrial Permit and New Industrial Permit<sup>5</sup> since at least February 24, 2011. These violations are ongoing and the A & B Truck Owners will continue to be in violation every day they fail provide an adequate SWPPP for the Facility. Thus, the A & B Truck Owners are liable for civil penalties of up to \$37,500 per day of violation for 1,825 violations of the General Industrial Permit and the Clean Water Act.

### **III. Remedies**

Upon expiration of the 60-day period, CERF will file a citizen suit under Section 505(a) of the Clean Water Act for the above-referenced violations. During the 60-day notice period, however, CERF is willing to discuss effective remedies for the violations noted in this letter. If you wish to pursue such discussions in the absence of litigation, it is suggested that you initiate those discussions immediately. If good faith negotiations are not being made, at the close of the 60-day notice period, CERF will move forward expeditiously with litigation.

A & B Truck must develop and implement an updated SWPPP, install BMPs to address the numerous water quality violations, and implement a robust monitoring plan. Should the A & B Truck Owners fail to do so, CERF will file an action against A & B Truck for its prior, current, and anticipated violations of the Clean Water Act. CERF's action will seek all remedies available under the Clean Water Act § 1365(a)(d), including recovery of expert fees, costs, and attorneys' fees. CERF will seek the maximum penalty available under the law which is \$37,500 per day.

CERF may further seek a court order to prevent A & B Truck from discharging pollutants. A strong or substantial likelihood of success on the merits of CERF's claim exists, and irreparable injuries to the public, public trust resources, and the environments will result if the Facility further discharges pollutants into Chollas Creek and San Diego Bay.

### **IV. Conclusion**

CERF has retained legal counsel to represent it in this matter. Please direct all communications to Coast Law Group:

**Marco A. Gonzalez**  
**COAST LAW GROUP LLP**  
**1140 S. Coast Highway 101**  
**Encinitas, CA 92024**  
**Tel: (760) 942-8505 x 102**  
**Fax: (760) 942-8515**  
**Email: marco@coastlawgroup.com**

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<sup>5</sup> Violations of the New Industrial Permit commenced July 1, 2015.

CERF will entertain settlement discussions during the 60-day notice period. Should you wish to pursue settlement, please contact Coast Law Group LLP at your earliest convenience.

Sincerely,

**COAST LAW GROUP LLP**

  
**Marco A. Gonzalez**



**Livia Borak**

Attorneys for

Coastal Environmental Rights Foundation

cc:

Jared Blumenfeld, Region 9 Administrator Alexis Strauss, Deputy Regional Administrator U.S. EPA, Region 9 75 Hawthorne Street San Francisco, CA, 94105	Dave Gibson, Executive Officer Catherine Hagan, Staff Counsel San Diego Regional Water Quality Control Board 2375 Northside Drive, Suite 100 San Diego, CA 92108-2700
Gina McCarthy EPA Administrator Mail Code 4101M USEPA Ariel Rios Building (AR) 1200 Pennsylvania Avenue N.W. Washington, DC 20004	Thomas Howard Executive Director State Water Resources Control Board P.O. Box 100 Sacramento, CA 95812-0110



**EXHIBIT A**

# Qualifying Rainfall Events (.1 inches of rain or more) During Business Hours

## NOAA National Climactic Data Center

Stations: COOP:047740 - SAN DIEGO LINDBERGH FIELD, CA US

Data Types: HPCP - Precipitation (100th of an inch)

2009

<u>Month</u>	<u>Inches</u>	<u>Time:</u>
6-Feb	0.61	
7-Feb	0.74	
8-Feb	0.2	
9-Feb	0.21	8:00 AM
10-Feb	0.34	
14-Feb	0.13	
16-Feb	0.62	12:00 PM
22-Mar	0.22	11:00 AM
31-May	0.13	
4-Jun	0.13	
29-Nov	0.35	
7-Dec	0.13	9:00 AM
8-Dec	1.99	
12-Dec	0.13	
13-Dec	0.88	
<b>TOTAL</b>	<b>6.81</b>	

2010

<u>Month</u>	<u>Inches</u>	<u>Time:</u>
18-Jan	0.1	4:00 PM
19-Jan	1.4	1:00 PM
20-Jan	7.4	
21-Jan	1.65	12:00 PM
22-Jan	1.41	
23-Jan	0.29	
27-Jan	0.14	
6-Feb	0.17	11:00 AM
7-Feb	0.27	
10-Feb	0.47	
20-Feb	0.49	
22-Feb	0.12	
27-Feb	0.2	
28-Feb	1.27	
7-Mar	0.38	10:00 AM
8-Mar	0.3	
1-Apr	0.49	
6-Apr	0.15	
12-Apr	0.65	4:30 PM
22-Apr	0.47	
6-Oct	0.43	
20-Oct	0.9	12:00 PM
21-Oct	0.12	
30-Oct	0.38	8:00 AM
20-Nov	0.69	2:00 PM
21-Nov	0.12	11:00 AM
24-Nov	0.87	
20-Dec	0.83	
21-Dec	3.46	8:00 AM
22-Dec	0.48	8:00 AM
26-Dec	0.69	
30-Dec	1.8	9:00 AM
<b>TOTAL</b>	<b>28.59</b>	

# Qualifying Rainfall Events (.1 inches of rain or more) During Business Hours

## NOAA National Climactic Data Center

Stations: COOP:047740 - SAN DIEGO LINDBERGH FIELD, CA US

Data Types: HPCP - Precipitation (100th of an inch)

2011

<u>Month</u>	<u>Inches</u>	<u>Time:</u>
3-Jan	0.85	
4-Jan	0.1	
18-Feb	0.24	5:00 AM
20-Feb	0.2	
26-Feb	0.8	
27-Feb	0.22	
7-Mar	0.2	
21-Mar	0.89	
22-Mar	0.14	
24-Mar	0.25	
26-Mar	0.15	
9-Apr	0.14	
18-May	0.73	
29-May	0.1	
4-Nov	0.34	4:00 PM
12-Nov	1.04	1:00 PM
12-Dec	0.96	9:00 AM
<b>TOTAL</b>	<b>7.35</b>	

2012

<u>Month</u>	<u>Inches</u>	<u>Time:</u>
23-Jan	0.2	2:00 PM
24-Jan	0.28	
7-Feb	0.23	4:00 PM
14-Feb	0.34	
16-Feb	0.2	
28-Feb	0.72	
17-Mar	0.24	1:00 PM
18-Mar	0.47	
25-Mar	0.43	5:00 PM
1-Apr	0.11	
11-Apr	0.45	
13-Apr	0.33	4:00 PM
26-Apr	0.61	
12-Oct	0.77	
8-Nov	0.14	
1-Dec	0.23	
13-Dec	1.6	8:00 AM
14-Dec	0.28	
15-Dec	0.37	
19-Dec	0.47	
25-Dec	0.37	
30-Dec	0.28	
<b>TOTAL</b>	<b>9.12</b>	



## Qualifying Rainfall Events (.1 inches of rain or more) During Business Hours

### NOAA National Climactic Data Center

Stations: COOP:047740 - SAN DIEGO LINDBERGH FIELD, CA US

Data Types: HPCP - Precipitation (100th of an inch)

2013

<u>Month</u>	<u>Inches</u>
7-Jan	0.26
25-Jan	0.23
26-Jan	0.73
27-Jan	0.1
9-Feb	0.15
20-Feb	0.3
9-Mar	0.2
21-Nov	0.28
22-Nov	0.2
8-Dec	0.17
20-Dec	0.1
<b>TOTAL</b>	<b>2.72</b>

2014

<u>Month</u>	<u>Inches</u>
3-Feb	0.25
7-Feb	0.37
27-Feb	0.1
28-Feb	0.46
1-Mar	0.76
2-Mar	0.6
2-Apr	0.22
26-Apr	0.13
<b>TOTAL</b>	<b>2.89</b>

**EXHIBIT B**





A & B Truck Recycling, Exhibit B, p. 1















A & B Truck Recycling, Exhibit B, p. 5